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IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE: §  
EDWARD GARCIA § Case No.21-40288  
Debtor §

RESPONSE TO MOTION TO DISMISS

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE BRENDA T. RHOADES:

COMES NOW, Edward Garcia, Debtor in the above styled and numbered cause and files this his Response to Motion to Dismiss (“Motion”) and in support thereof would show unto the court as follows:

1. Debtor admits the allegations contained in paragraph 1 of the Motion.
2. Debtor admits the allegations contained in paragraph 2 of the Motion.
3. Debtor admits the allegations contained in paragraph 3 of the Motion.
4. Debtor admits the allegations contained in paragraph 4 of the Motion.
5. Debtor denies the allegations contained in paragraph 5 of the Motion.
6. Debtor denies the allegations contained in paragraph 6 of the Motion.
7. Debtor denies the allegations contained in paragraph 7 of the Motion.

8. Debtor denies the allegations contained in paragraph 8 of the Motion.
9. Debtor denies the allegations contained in paragraph 9 of the Motion.
10. Debtor denies the allegations contained in paragraph 10 of the Motion.
11. Debtor denies the allegations contained in paragraph 11 of the Motion.
12. Debtor denies the allegations contained in paragraph 12 of the Motion.
13. Debtor denies the allegations contained in paragraph 13 of the Motion.

WHEREFORE PREMISES CONSIDERED, Debtor prays this Court enter an Order denying the Motion, and for such other and further relief in law or in equity to which the Debtor may show himself justly entitled.

Respectfully submitted,

/s/ ERIC LIEPINS  
Eric Liepins  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was sent to John Vardeman, 110 College Suite 300, Tyler, Texas 75702 on this the 26th day of April 2021.

/s/ Eric Liepins  
Eric Liepins